

October 12, 2007

Marlene R. Daughtrey
Reports Analyst Division
Federal Election Commission
999 E St., NW
Washington, D.C. 20463

Re: Response from Committee ID#C00417063 for Amended May Monthly
Report (4/01/07-4/30/07), received 6/26/07.

Dear Ms. Daughtrey,

I write to respond to the September 21, 2007 inquiry received from the Federal Election Commission by the West Virginia Republican Party, Inc. with the assigned ID# C00417063. This letter asks questions related to the West Virginia Republican Party, Inc.'s Amended May Monthly Report (4/01/2007-4/30/2007), received 6/26/2007.

The Federal Election Commission asks for clarification for the activities identified as MEMO entries reported in Schedule A supporting Line 11(a)(i). The Federal Election Commission noted that the activities reported as MEMO entries did not correspond to itemized transactions. The Federal Election Commission asks that this report be amended to provide clarifying information regarding this activity. The activities were reported as MEMO entries because they were expenses paid by an individual that were not reimbursed until the next reporting period. They were reported as expenses in the June Monthly Report. This question arose because I failed to note that these expenses were "to be reimbursed." I have amended this Report to reflect that these expenses were "to be reimbursed." I have also corrected subsequent Reports that contain the same error. These clarifications are available to the Federal Election Commission in the West Virginia Republican Party, Inc.'s amended report, filed with the Commission 10/12/2007.

The Federal Election Commission also asks for further information concerning expenses reported on Schedule B supporting Line 21(b) totaling \$9904.97 for "Consultant-Media," "postage," and "Printing Expenses for Fundraiser." The Federal Election Commission asks if these expenditures for public communications meet the definition of Federal Election Activity or if it contains express advocacy, then this report should be amended to disclose that activity. These expenses were all for generic fundraising for party operation funds and for generic party communications. These expenditures were not Federal Election Activity. They did not refer to a clearly identified candidate for federal office nor did they promote, support, attack or oppose any candidate for Federal office. These communications did not express advocacy and therefore there is no need to amend this report to disclose in-kind contributions, independent expenditure or coordinated party expenditure. I have amended this 2007 May Monthly Report (4/1/07-4/30/07) to add clarification to the expense descriptions as well as in memo text associated with the expenses where the Federal Election Commission has asked for clarification. The financial activity is unchanged so the amendments are only to add clarity to the descriptions of the expenses noted by the Federal Election Commission.

The Federal Election Commission also asks for clarification for all expenditures made for "Catering Expense," "Fundraising Consulting," "In-Kind-Basket Contents for Fundraiser," "In-Kind Decorations for Fundraiser," and "Supplies for Fundraiser" on Schedule B. The Federal Election Commission asks that if a portion or all of these expenditures were made on behalf of specifically identified federal candidates then this should be disclosed along with the name of the candidate as well as the office sought by the candidate. All of the noted expenses were for generic fundraisers to raise generic funds for the party for operating expenses. These expenditures were not made in part or in whole on behalf of specifically identified federal candidate. The financial activity is unchanged so the amendments are only to add clarity to the descriptions of the expenses and to add memo text where necessary to add clarity for the expenses

ETEXT ATTACHMENT

questioned by the Federal Election Commission.

Please contact me with any questions.

Sincerely,

Theresa A. Waxman, Treasurer
West Virginia Republican Party
